

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED: October 11, 2012
CRAIG JOHNSON,	:	VIOLATIONS: 18 U.S.C. § 1591 (sex
a/k/a "GEEZ"	:	trafficking of children - 2 counts)
	:	18 U.S.C. § 1594(a) (attempt)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, defendant CRAIG JOHNSON, a/k/a "Geez," was the operator of a prostitution venture in Philadelphia, Pennsylvania.

2. As part of this venture, defendant CRAIG JOHNSON, a/k/a "Geez," recruited young females to work as prostitutes in his business. Two of the females whom he recruited and who worked for him, Minor 1 and Minor 2, whose names are known to the grand jury, were under the age of 18 years.

3. As part of this venture, defendant CRAIG JOHNSON, a/k/a "Geez," created Internet advertisements in which he advertised various females as available for purchase for purposes of prostitution. These advertisements featured pictures of the prostitutes, either scantily clad or partially nude, the price for an encounter, and a phone number to call to arrange a meeting with a prostitute.

4. Between on or about June 7, 2012, through on or about June 9, 2012,
in the Eastern District of Pennsylvania, defendant

CRAIG JOHNSON,
a/k/a “GEEZ,”

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained Minor 1, whose identity is known to the grand jury, and benefitted financially from participation in a venture which engaged in the knowing recruitment, enticement, harboring, transporting, providing, obtaining, and maintaining of Minor 1, and attempted to do so. At the time that defendant CRAIG JOHNSON did this, he knew and acted in reckless disregard of the fact that Minor 1 had not attained the age of 18 years and that Minor 1 would be caused to engage in commercial sex acts.

In violation of Title 18, United States Code, Sections 1591 and 1594(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations of Paragraphs 1 through 3 of Count One are incorporated by reference.

2. Between on or about June 1, 2012, through on or about June 14, 2012, in the Eastern District of Pennsylvania, defendant

**CRAIG JOHNSON,
a/k/a “GEEZ,”**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained Minor 2, whose identity is known to the grand jury, and benefitted financially from participation in a venture which engaged in the knowing recruitment, enticement, harboring, transporting, providing, obtaining, and maintaining of Minor 1, and attempted to do so. At the time that defendant CRAIG JOHNSON did this, he knew and acted in reckless disregard of the fact that Minor 2 had not attained the age of 18 years and that Minor 2 would be caused to engage in commercial sex acts.

In violation of Title 18, United States Code, Sections 1591 and 1594(a).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1591, set forth in this Indictment, defendant

**CRAIG JOHNSON,
a/k/a "GEEZ,"**

shall forfeit to the United States of America:

(a) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such violation;

(b) any property, real or personal, used or intended to be used to commit or to promote the commission of such violation; and

(c) any visual depiction described in Title 18, United States Code, Sections 2251 and 2256, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received as a result of such violation.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 1594(d) and (e) and 2253.

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney